

***DECLARATION OF***  
***YILIANG GUO***  
***12/8/23***

**KHALE J. LENHART, #7-4693  
TYSON R. WOODFORD, #8-6650**

Hirst Applegate, LLP  
P. O. Box 1083  
Cheyenne, WY 82003-1083  
Phone: (307) 632-0541  
Fax: (307) 632-4999  
[klenhart@hirstapplegate.com](mailto:klenhart@hirstapplegate.com)  
[twoxford@hirstapplegate.com](mailto:twoxford@hirstapplegate.com)

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON  
BLOCKCHAIN, a Wyoming limited  
liability company, }  
Plaintiff, }  
vs. } Civil No. 23-CV-79J  
MINEONE WYOMING DATA CENTER  
LLC, a Delaware limited liability company; }  
MINEONE PARTNERS LLC, a Delaware }  
limited liability company; TERRA }  
CRYPTO INC., a Delaware corporation; }  
BIT ORIGIN, LTD., a Cayman Island }  
Company; SONICHASH LLC, a Delaware }  
limited liability company; BITMAIN }  
TECHNOLOGIES HOLDING COMPANY, }  
a Cayman Island Company; BITMAIN }  
TECHNOLOGIES GEORGIA LIMITED, a }  
Georgia corporation; and JOHN DOES }  
1-18, related persons and companies who }  
control or direct some or all of the named }  
Defendants, }  
Defendants.

**DECLARATION OF YILIANG GUO IN SUPPORT OF MOTION TO SET ASIDE  
ENTRY OF DEFAULT AGAINST DEFENDANT BITMAIN TECHNOLOGIES  
GEORGIA LIMITED**

I, Yiliang Guo, declare as follows:

1. I am an employee of Bitmain Technologies Inc. (北京比特大陆科技有限公司), an affiliate of Defendant Bitmain Technologies Georgia Limited. I submit this declaration in support of Defendant Bitmain Technologies Georgia Limited's Motion to Vacate Default. I have personal knowledge of the facts set forth herein, and if called upon to do so could competently testify thereto.

2. I have been employed by Bitmain Technologies Inc. since April 2018. I am responsible for Bitmain's business development relating to data center hosting services in the United States. In my role, I serve as a primary point of contact for MineOne Wyoming Data Center, LLC ("MineOne").

3. On November 21, 2023, at 1:53 AM Hong Kong Time, Ms. Lianfei (Haku) Du, an operation manager of MineOne Partners LLC, an affiliate of MineOne, and my usual contact at MineOne, left me several WeChat voice messages, alerting me that Bitmain Technologies Georgia Limited (together with its affiliates, "Bitmain") was named along with MineOne as a defendant in a lawsuit filed by Plaintiff BCB Cheyenne. Ms. Du informed me that Bitmain must respond to the complaint under United States law and said the matter was urgent.

4. I then asked Bitmain's legal department whether Bitmain had received a copy of the complaint in the lawsuit filed by Plaintiff BCB Cheyenne. I was informed that Bitmain had not received any such complaint.

5. On November 21, 2023, at 7:21 AM Hong Kong Time, I responded to Ms. Du, stating that Bitmain had not yet received the complaint. I asked Ms. Du for a copy of the complaint.

6. On November 21, 2023, at 8:57 AM Hong Kong Time, Ms. Du sent me via WeChat a document titled, Plaintiff's First Amended Complaint for Breach of Contract, Anticipatory Repudiation of Contract, Intentional Interference with Contractual Relationship, *Alter Ego* Liability, Enterprise Liability, and Lost Profits and Money Damages in the *BCB*

*Cheyenne LLC v. MineOne Wyoming Data Center LLC, et al.* action, Case No. 1:23-cv-00079-ABJ, pending in the United States District Court for the District of Wyoming.

7. All of the above-referenced WeChat voice messages and messages between Ms. Du and myself were in Mandarin.

8. I had no knowledge of the *BCB Cheyenne LLC v. MineOne Wyoming Data Center LLC, et al.* lawsuit prior to November 21, 2023 Hong Kong Time.

9. To my knowledge, no one at Bitmain had knowledge or was aware of the *BCB Cheyenne LLC v. MineOne Wyoming Data Center LLC, et al.* lawsuit prior to November 21, 2023 Hong Kong Time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 8<sup>th</sup> day of December 2023 in Beijing, China.



---

Yiliang Guo